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December 2, 2013

Ms. Elizabeth Rolando  
Chief Clerk  
Illinois Commerce Commission  
527 East Capital Avenue  
Springfield, Illinois 62701

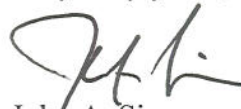
**Re: Gan Properties LLC's Rebuttal Testimony on Rehearing,  
Illinois River Project, ICC Docket No. 12-0598**

Dear Ms. Rolando:

We represent Gan Properties LLC ("Gan Properties"), whose property in Shelby County would be bisected by ATXI's Proposed Alternate Route between Pana and Mt. Zion. We believe that no party to this proceeding on rehearing supports ATXI's Proposed Alternate Route between Pana and Mt. Zion. *See, e.g.,* Direct Testimony on Rehearing of Donnell Murphy, p. 13:160-164 ("Figure 4 shows two alternatives available to the Commission: (1) the ATXI/MCPO [stipulated] route [corresponding to ATXI's Proposed Primary Route between Pana and Mt. Zion]; and (2) the Corzine/Assumption Group route").

Gan Properties respectfully resubmits the enclosed testimony of Ken Skolnik, previously submitted to the ICC e-docket in this action on May 10, 2013, in opposition to ATXI's Proposed Alternate Route Between Pana and Mt. Zion as its rebuttal testimony, notwithstanding that no party advocates its adoption by the Commission, in view of the Administrative Law Judges' November 21 Ruling.

Very truly yours,



John A. Simon

JAS/etb

Enclosure

cc: Parties of Record (w/enclosure)

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF ILLINOIS	)	
	)	
Petition for a Certificate of Public Convenience and	)	
Necessity, pursuant to Section 8-406.1 of the Illinois	)	
Public Utilities Act, and an Order pursuant to Section 8-	)	Docket No. 12-0598
503 of the Public Utilities Act, to Construct, Operate and	)	
Maintain a New High Voltage Electric Service Line and	)	
Related Facilities in the Counties of Adams, Brown,	)	
Cass, Champaign, M/S CLTF, Clark, Coles, Edgar,	)	
Fulton, Macon, Montgomery, Morgan, Moultrie, Pike,	)	
Sangamon, Schuyler, Scott and Shelby, Illinois.	)	

**AMENDED DIRECT TESTIMONY OF KENNETH L. SKOLNIK  
ON BEHALF OF GAN PROPERTIES LLC**

Kenneth L. Skolnik, being duly sworn upon oath, states as follows:

1. My name is Kenneth L. Skolnik. I serve as the Manager of Gan Properties LLC (“Gan Properties”). In this capacity, I have access to documents belonging to Gan Properties. The statements made in this Affidavit are based upon my personal knowledge and the Gan Properties records I have under my custody, control, and supervision. If called upon to testify in this matter, I would competently testify to the facts and matters set forth herein.
2. In 2008, Gan Properties purchased approximately 147 acres from Larry and Jacqueline Chaney, in Section 32 of Pickaway Township, Shelby County, Illinois. *See* 2008 Warranty Deed, attached hereto as Gan Properties’ Exhibit 1.1.
3. In 2010, Gan Properties purchased an additional 12.60 acres, including a house and a number of other structures, from Larry and Jacqueline Chaney in Section 32 of Pickaway Township, Shelby County, Illinois. The 12.60 acres adjoins the property Gan Properties purchased from Mr. and Mrs. Chaney in 2008, and completes a regularly shaped, square quarter-section. *See* 2010 Warranty Deed, attached hereto as Gan Properties’ Exhibit 1.2.

4. Gan Properties' quarter section is located in the center of the southern half-section of Section 32 of Pickaway Township, Shelby County, Illinois and is depicted in the attached 2012 Plat Map of Pickaway Township. Gan Properties' Exhibit 1.3.

5. Matt Burgner actively farms Gan Properties' quarter-section. Mr. Burgner has farmed the quarter-section for 4 years.

6. Fred Davis currently resides in the house located on Gan Properties' quarter-section.

7. The Pana to Mt. Zion segment of ATXI's Proposed Alternate Route for the Illinois Rivers Project runs directly through the center of Gan Properties' quarter-section. *See* +ATXI Verified Petition Exhibit A, Part 4 of 5 (Gan Properties' Exhibit 1.4); Illinois River Project, Map of Proposed Routes, Shelby County, available at: <http://www.ilriverstransmission.com/linkclick.aspx?fileticket=PWxP%2bN5ZhIE%3d&tabid=1751> (last accessed March 29, 2013) (Gan Properties' Exhibit 1.5); and Section of Map of Proposed Routes through Shelby County depicting Pickaway Township (Gan Properties' Exhibit 1.6).

8. Gan Properties objects to the segment of ATXI's Proposed Alternate Route that runs through the center of its quarter-section. Gan Properties did not receive notice of the Project until the second half of January, 2013 pursuant to the attached Notice. Gan Properties' Exhibit 1.7. Even then, the January 2013 Notice does not clearly state that the Project will impact Gan Properties, let alone decimate it, as would be the case if AXTI's Proposed Alternate Route were adopted.

9. AXTI's Proposed Alternate Route through the center of Gan Properties' quarter-section would destroy its utility. In place of an uninterrupted, contiguous, compact quarter-

section of highly productive Illinois farmland, Gan Properties would be left with two disconnected parcels of real estate bisected by a 150 foot easement, high voltage transmission lines, and the construction of numerous steel poles with large concrete foundations.

10. The bisection of the quarter-section with the transmission poles, including foundations and transmission lines, and the 150 foot easement, would disrupt Gan Properties' farming operation, currently run by Matt Burgner, and destroy the value of Gan Properties' quarter-section.

11. The route of the transmission lines directly alongside the house on Gan Properties' quarter-section would destroy the use and enjoyment of the home. The location of the transmission lines would make the home more difficult to rent out to others for the same reasons, raising the likelihood that the property would not have anyone residing on the premises.

12. Gan Properties is not directly impacted by ATXI's Proposed Primary Route. However, Gan Properties is severely impacted by the Pana to Mt. Zion segment of ATXI's Proposed Alternate Route. Gan Properties objects to the portion of the segment of ATXI's Proposed Alternate Route that runs through the middle of its quarter-section located in the southern half section of Section 32 of Pickaway Township, Shelby County. [The remainder of paragraph 12 stricken per April 24, 2013 Order of the ALJs.]

13. [Paragraph 13 stricken per April 24, 2013 Order of the ALJs.]

14. [Paragraph 14 stricken per April 24, 2013 Order of the ALJs.]

15. Gan Properties' objection to ATXI's Project is not limited to its specific objections to the segment of ATXI's Proposed Alternate Route that runs through its property. Gan Properties objects to the entire segment of ATXI's Proposed Alternate Route between Pana and Mt. Zion, and in addition objects to the entire Project as the costs of the Project, specifically

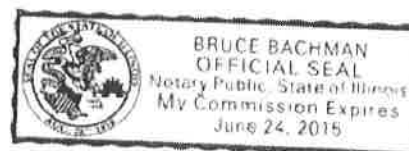
in the form of the tremendous damage to valuable, unique, irreplaceable Illinois farmland, far outweigh the nebulous, speculative, and unsupported benefits contained in ATXI's Verified Petition.

[continued on next page]

Further Affiant Sayeth Not.

*[Handwritten signature]*

Kenneth L. Skolnik  
Manager, Gan Properties LLC  
1000 W. North Avenue  
Chicago, IL 60642



Subscribed and sworn to before me  
this 29<sup>TH</sup> day of March, 2013.

*[Handwritten signature]*

Notary Public

**VERIFICATION**

John A. Simon, being duly sworn, verifies that he is a practicing attorney in the firm of Drinker Biddle & Reath LLP and one of the attorneys for Gan Properties LLC, and that the foregoing Amended Affidavit of Kenneth L. Skolnik is the duly executed and notarized affidavit of Kenneth L. Skolnik, Manager of Gan Properties LLC.

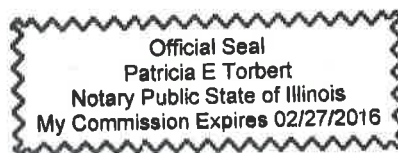


John A. Simon  
Drinker Biddle & Reath LLP  
191 N. Wacker Drive, Ste. 3700  
Chicago, IL 60606  
(312) 569-1392  
[john.simon@dbr.com](mailto:john.simon@dbr.com)

Subscribed and sworn to before me  
this 10th day of May, 2013.



Notary Public



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